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*Counsel to Bradley D. Sharp,
Chapter 11 Trustee*

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re

LESLIE KLEIN,

Debtor.

BRADLEY D. SHARP, Chapter 11 Trustee,

Plaintiff,

v.

LIFE CAPITAL GROUP, LLC, a limited
liability company, SHLOMO Y.
RECHNITZ, individually and as a member
of LIFE CAPITAL GROUP, LLC,
YISROEL ZEV RECHNITZ, an individual,
CHAIM MANELA, an individual,
JONATHAN POLTER, an individual and as a
manager of LIFE CAPITAL GROUP, and
SECURITY LIFE OF DENVER LIFE
INSURANCE COMPANY,

Defendant.

Case No. 2:23-bk-10990-NB

Chapter 11

Adv No. 2:25-ap-01020-NB

**THIRD STIPULATION TO CONTINUE
RESPONSE DATE FOR DEFENDANT
SECURITY LIFE OF DENVER
INSURANCE COMPANY**

Defendant Security Life of Denver Insurance Company (the “*Defendant*”), and Plaintiff
Bradley D. Sharp, Chapter 11 Trustee (the “*Trustee*”), on the other hand, by and through their
respective counsel, hereby stipulate as follows:

RECITALS

1. On January 23, 2025, the Trustee filed a Complaint against the Defendant, among others, commencing adversary proceeding no. 2:25-ap-01020-SK.

2. Process has been served upon the Defendant.

3. On February 21, 2025, Plaintiff and Defendant entered into a stipulation extending Defendant's time to respond to the Complaint from February 24, 2025 to March 31, 2025 [Adv. Docket No. 10], which was approved by the Court on the same date [Adv. Docket No. 11].

4. On March 28, 2025, Plaintiff and Defendant entered into a second stipulation extending Defendant's time to respond to the Complaint from March 31, 2025 to May 20, 2025 [Adv. Docket No. 37], which approved by the Court on the same date [Adv. Docket No. 38].

5. The Plaintiff has agreed to further extend Defendant's time to respond until July 8, 2025 as set forth herein.

STIPULATION

Subject to Court approval, the parties to this Stipulation hereby stipulate and agree as follows:

A. The date by which the Defendant must file and serve a response to the Complaint is continued from May 20, 2025 through and including July 8, 2025.

B. The Trustee is authorized to lodge an order with the Court incorporating the terms of this Stipulation.

Dated: May 14, 2025

PACHULSKI STANG ZIEHL & JONES LLP


By /s/ John W. Lucas
John W. Lucas

Attorneys for Plaintiff Bradley D. Sharp,
Chapter 11 Trustee

1 Dated: May 8, 2025

McDOWELL HETHERINGTON LLP

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3 By


John T. Burnite

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5 Attorneys for Defendant Security Life of Denver
6 Insurance Company
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